

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE M/Y *AMADEA*, A MOTOR YACHT  
BEARING INTERNATIONAL MARITIME  
ORGANIZATION NO. 1012531, INCLUDING  
ALL FIXTURES, FITTINGS, MANUALS,  
STOCKS, STORES, INVENTORIES, AND  
EACH LIFEBOAT, TENDER, AND OTHER  
APPURTENANCE THERETO,

Defendant-*In-Rem*,

and

EDUARD YURIEVICH KHUDAINATOV,  
MILLEMARIN INVESTMENTS LTD.,

Claimants.

Case No. 1:23-cv-09304

The Honorable Dale E. Ho

**DECLARATION OF ADAM C. FORD IN SUPPORT OF CLAIMANTS' MOTION FOR  
RECONSIDERATION OR CERTIFICATION UNDER 28 U.S.C. § 1292(b)**

I, Adam C. Ford of Ford O'Brien Landy LLP, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly licensed to practice in the State of New York. I am a partner with the law firm Ford O'Brien Landy LLP, counsel for Claimants Eduard Yurievich Khudainatov and Millemarin Investments Ltd. in the above-captioned matter.

2. I respectfully submit this declaration in support of Claimants' Memorandum of Law in Support of Motion for Reconsideration or Certification Under 28 U.S.C. § 1292(b). I have personal knowledge of the facts below and, if called as a witness, I could testify competently thereto.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Application and Affidavit in Support of an Application for a Seizure Warrant signed by Timothy J. Bergen dated April 13, 2022, in the case captioned In the Matter of the Seizure of THE MOTOR YACHT AMADEA, WITH INTERATIONAL MARITIME ORGANIZATION NUMBER 1012531, Case No. 22-sz-9 in the United States District Court for the District of Columbia.

4. Attached hereto as **Exhibit B** is a true and accurate copy of the URGENT Supplemental Request for Assistance in the Investigation of Suleiman Abusaidovich Kerimov sent to the Central Authority of the Republic of Fiji by the U.S. Department of Justice, Office of International Affairs on April 13, 2022.

5. Attached hereto as **Exhibit C** is a true and accurate copy of the United Nations Convention Against Transnational Organized Crime and the Protocols Thereto, of which both the U.S. and Fiji have ratified.

6. Attached hereto as **Exhibit D** is a true and accurate copy of the Supreme Court of Fiji at Suva's judgment in *Millemarin Investments Ltd. v. The Director of Public Prosecutions and Suleiman Abusaidovich Kerimov*, No. CBV 0006 of 2022 (Sup. Ct. Fiji. Suva Apr. 28, 2023).

Dated: March 7, 2024  
New York, New York

Respectfully submitted,

FORD O'BRIEN LANDY LLP

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*Attorney for Claimants Eduard Yurievich  
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Ltd.*